

RUSH

U.S. DISTRICT COURT
MILWAUKEE, WISCONSIN

2004 DEC -6 PM 4:15 AM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

In re: LISA S. BLYTH,

MILWAUKEE, WISCONSIN

Debtor.

Case No.: 04-26018 svk

ROBERT MULLINS,

Chapter 7

Plaintiff,

Adv. Proc. No.: 04-2274

vs.

LISA S. BLYTH,

Defendant.

**NOTICE OF MOTION AND MOTION FOR ENLARGEMENT
OF TIME TO FILE ANSWER**

TO: Clerk, United States Bankruptcy Court
U.S. Courthouse, Room 126
517 East Wisconsin Avenue
Milwaukee, WI 53202

Attorney Steven W. Jelenchick
Beck, Chaet & Bamberger, S.C.
Two Plaza East, Suite 1085
330 East Kilbourn Avenue
Milwaukee, WI 53202

PLEASE TAKE NOTICE that on the ____ day of December, 2004, at ____:m., the defendant, Lisa S. Blyth, by his attorney, Christopher S. Carson, will move this Court pursuant to F.R. Civ. 6(b) for an enlargement of the time to file responsive pleadings in this matter.

That the failure to file a responsive pleading within the ascribed time was the result of excusable neglect., to wit:

1. The undersigned counsel was just retained by the defendant and immediately moved herein to file an Answer.
2. That the defendant lacks the requisite legal knowledge to file an Answer pro se and attempted to find an attorney who would take the case.
3. That the defendant's case has significant merits.

Dated this 6 day of December, 2004.

CARSON LAW OFFICE

Attorney Christopher S. Carson (#1018184)

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